

UNITED STATES DISTRICT COURT

for the  
Western District of Arkansas  
El Dorado Division

US DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FILED  
JUL 08 2016  
By DOUGLAS F. YOUNG, Clerk  
Deputy Clerk

In the Matter of the Search of:  
122 Virginia  
Camden, AR 71701

Case No. 1:16-CM-08

**FILED UNDER SEAL**

APPLICATION FOR A SEARCH WARRANT

I, Tonja Sablatura, Special Agent with the Federal Bureau of Investigation, request a search warrant and state under penalty of perjury that I have reason to believe that there is now concealed on the following person or property located in the Western District of Arkansas (*identify the person or describe property to be searched and give its location*):

See Attachment "A" (incorporated by reference).

The person or property to be searched, described above, is believed to conceal (*identify the person or describe the property to be seized*):

See Attachments "C" and "D" (incorporated by reference).

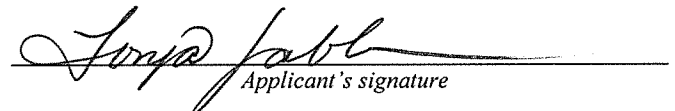
The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of 18 U.S.C. §§ 1343, 1349, 1956, and 1957 and the application is based on these facts:

☒ Continued on the attached sheet.

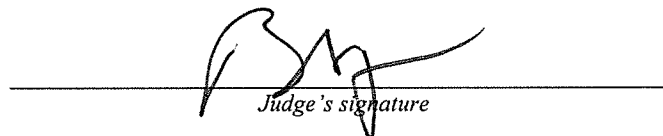
☐ Delayed notice of ☐ days (give exact ending date if more than 30 days: ) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature  
Special Agent Tonja Sablatura, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: July 8, 2016

City and state: Texarkana, Arkansas

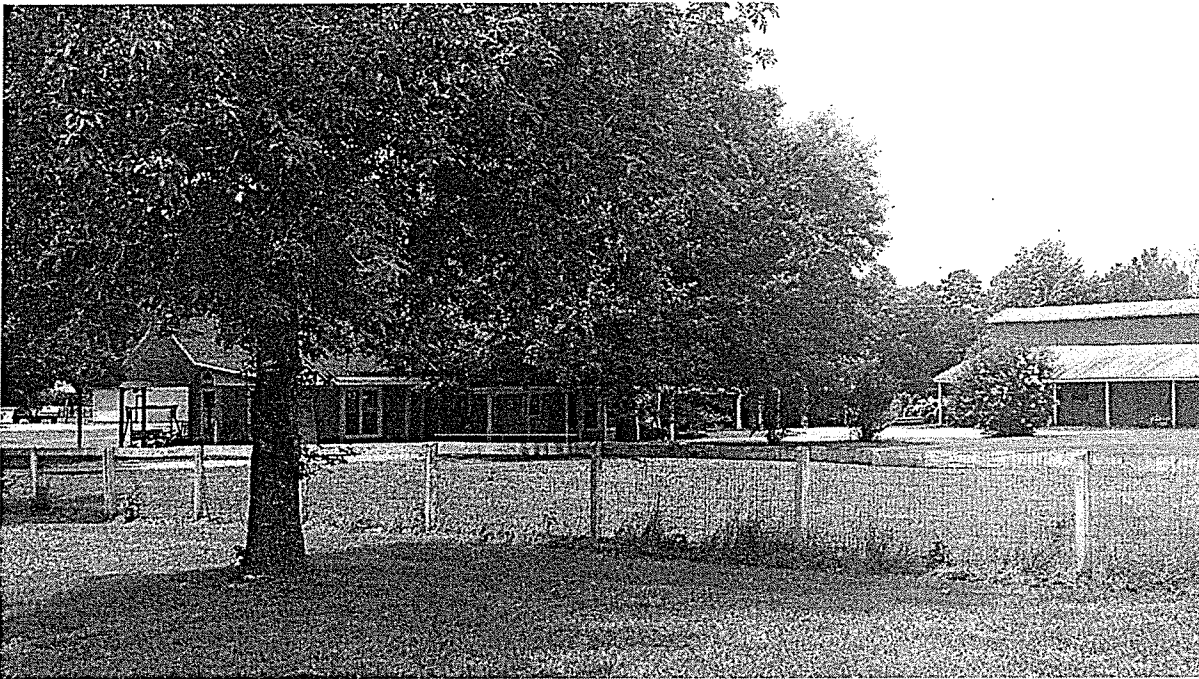
  
Judge's signature  
Honorable Barry A. Bryant, United States Magistrate Judge  
Printed name and title

**ATTACHMENT A**

**DESCRIPTIONS OF THINGS TO BE SEARCHED**

A residential property located in the Western District of Arkansas at 122 Virginia, Camden, Arkansas, including all locked containers, any computer or storage media, appurtenances, outbuildings, storage areas, garbage receptacles, and any vehicles on the cartilage.

The residence (pictured below), located near the intersection of Ouachita Road and Virginia Street, Camden, is more particularly described as a beige with white trim, single story, single family, residential home with an attached carport located behind the residence.



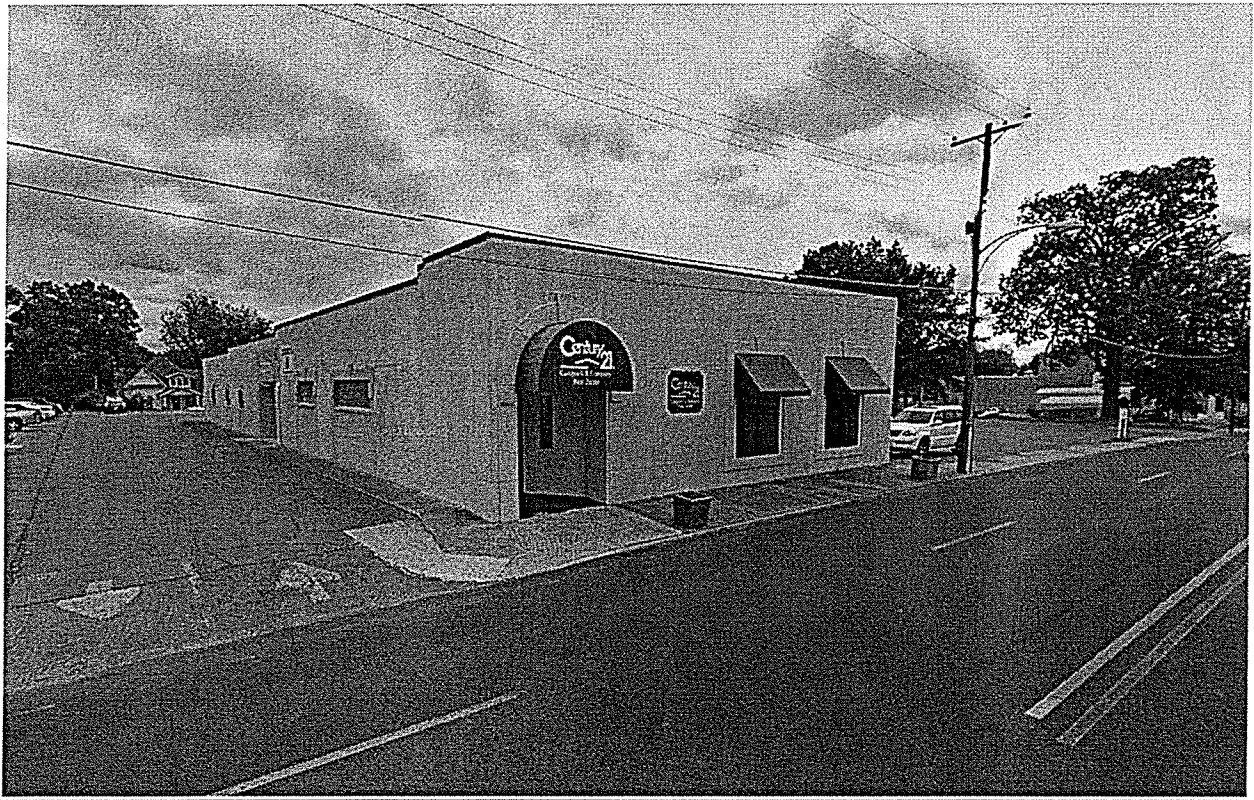


## **ATTACHMENT B**

### **DESCRIPTIONS OF THINGS TO BE SEARCHED**

The work space utilized by DONNA HERRING at the Century 21 business property located in the Western District of Arkansas at 301 West Washington Street, Camden, Arkansas, including all locked containers, and any computer or storage media

The business (pictured below), located near the intersection of Spring Avenue and West Washington Street, is more particularly described as a white, single story, office building with green awnings and adjacent parking areas. Primary access to the business is from the main entrance located on the north side of the building closest to West Washington Street.



**ATTACHMENT C**

Any and all material, records, and property, written records, wherever situated or stored, whether contained in locked or unlocked cabinets, desks, closets, or other containers on the premises and/or appurtenances of the premises described at Attachment A relating or incident to Donna Christina Herring, Jordan Alexander Peterson and others yet unknown that relates to Title 18, United States Code, Sections 1343 (wire fraud), 1349 (conspiracy to commit wire fraud), and 1956 & 1956 (money laundering )including but not limited to:

1. Any records or documents as it relates to personal identifiable information to include: names, date of births, social security numbers, military records, and addresses.
2. Any and all bank account information, including monthly bank statements, canceled checks, deposit slips, deposit items, cashier's checks, bank checks, drafts, debit cards, or any other instruments related to DONNA HERRING, PETERSON, DOUG HERRING and/or victim identities.
3. Indicia of control of the premises and things described, namely, utility bills, telephone bills, rent or lease or mortgage records pertaining to or evidencing ownership or control of the premises to be searched.
4. account statements, checks, transaction logs, documents, mail, inventory listings, letters, hand-written notes, financial statements or agreements, investments, loan or credit applications, life insurance applications and policies, notes or other financial instruments, financing documents, contracts, receipts, bills of sale, invoices, orders, investments, account statements, title documents, means of identification, safety deposit box records, safety deposit box keys, records of appointments, calendars, contacts, travel, and related communications records.
5. This warrant authorizes seizure of computer equipment and subsequent search of that equipment for the items specified in this attachment at a law enforcement facility. "Computer Equipment" refers to:
  - a. E-mail archiving appliance(s) including the contents of all e-mails stored in the email archiving appliance(s), copies of e-mails sent to and from the accounts for the specified entities or conspirators, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was

sent, and the size and length of each e-mail; all records or other information stored by the specified entities or conspirators using the account, including address books, contact and buddy lists, calendar data, pictures, and files.

- b. Computer server backup appliance(s) including the contents of all files stored on the computer server backup appliance(s) created or authored by the specified entities or conspirators, date and time the files were created or edited, all records or other information stored by the specified entities or conspirators using the appliance.
- c. Cellular telephones for the specified entities or conspirators including the contents of all files, emails, text, SMS, or instant messages, and photographs.
- d. Computer hardware consisting of all equipment that can collect, analyze, create, display, convert, store, conceal or transmit electronic, magnetic, optical or similar computer impulses or data. Hardware includes but is not limited to any data-processing devices such as central processing units, self-contained laptop, notebook or tablet device, data storage devices such as fixed or hard discs, floppy discs, thumb drives, optical storage devices, flash drives, CD's and DVD's.
- e. Computer software including programs to run operating systems, applications and utilities.

**ATTACHMENT D**

Known Assets Distributed to PETERSON  
(pursuant to Family Settlement Agreement)

1. Real estate:
  - a. Address: 153 Joan Street, Camden, Arkansas
  - b. Legal Description: PT SE1/4 NE1/4 (D20-270)
  - c. Acreage: 3.250 acres
  - d. Approximate Value: Purchase price (2007): \$235,000
  - e. Parcel Number: 008-00630-002R
  - f. Warranty Deed filed 5/18/2012
2. Real estate:
  - a. Address: 1120 Caddo Street, Arkadelphia, Arkansas 71923
  - b. Legal Description: MADDOX ADDN 3 W80' OF E 90' OF S 180', LOT 12
  - c. Approximate Value: Market Value: \$78,450
  - d. Parcel Number: 74-01801-000
  - e. Special Warranty Deed filed 4/29/2014
3. Real estate:
  - a. Address: 431 Sycamore Ave., Camden, Arkansas 71701
  - b. Legal Description: S 50' LOT 746 & S 50' OF W1/2 LOT 745 BLK 28
  - c. Approximate Value: Market Value: \$25,700
  - d. Parcel Number: 763-00214-000R
  - e. Warranty Deed filed 7/29/2014
4. Boat (with trailer)
  - a. Make: Tahoe
  - b. Model: Q7i Extreme
  - c. Year: 2014 or 2015
  - d. Approximate Value: \$40,000
5. 2014 Jeep Wrangler Unlimited (Black)
  - a. VIN: 1C4BJWEGXEL110705
  - b. Title Number: 76100060282
6. 2013 Kubota side by side ATV
  - a. Model-RTV1100CRX-A
  - b. Description- 24.8 HP UV Camo with Cab/Sliding Windows
  - c. Serial Number- A5KC1HDAJDG038432
  - d. Approximate Value- \$16,700
  - e. Purchased 9/19/2014



7. Kubota 50 horse power tractor with bush hog attachment with seed spreader and disc with forks that attaches to tractor bucket
8. Kubota zero turn mower
9. Texas Bragg trailer -20ft with 8000 pound wench in front
10. Texas Bragg trailer - 14ft.
11. Gooseneck Trailer
12. Firearms:
  - a. Mossburg Camo 17 gauge; serial number- R475199
  - b. Browning A-bolt 300 WSM; serial number- 03306MW351
  - c. Win. Mod. 9422 22 Mag; Serial Number- F727112
  - d. Mossburg 835 12 ga; Serial Number-UM837806
  - e. Knight ML; Serial Number- 006534
  - f. Ruger 10-22; Serial Number-35058056
  - g. Savage Mod. 110 30.6; Serial Number-F574560
  - h. Choke Rem. 1187 (Turkey Tru-Glow); Serial Number-P\_585174
  - i. Thompson Center 50 Cal Hawken Type M.L.
  - j. 50 Cal Stainless M.L; Serial Number-538300
  - k. Win. 22 Single Shot; Mod 67
  - l. GSG5 22; Serial Number-A271269
  - m. Browning A-Bolt 338 Win Mag; Serial Number- 27569NX757
  - n. Browning A-Bolt 30.6; Serial Number- 07704PW117
  - o. Marlin 22 Win Mag; Serial Number-93627244
  - p. H&R Handy Rifle; Unknown Serial Number
  - q. Serial Number-HL238927
  - r. Savage 93R17 17HM; Serial Number-0575101
  - s. Van Guard 7mm Mag; VS702458
  - t. Remi Wingmaster 870 12 gage; Serial Number- 754404V
  - u. Savage B Mag 17 Win Super Mag; Serial Number-J408101

- v. Mossburg 12 ga Pistol Grip; Serial Number-R941405
- w. Browning Buckmark (gold); Serial Number-213ZZ01578
- x. S&W 38 SP Airweight; Serial Number-DCM6295
- y. Glock 36 45 Auto; Serial Number-GLM888
- z. Raven Arms Med MP25 225 Auto; Serial Number- 1558517
- aa. Ruger New Bearcat 22 Pistol; Serial Number-93-36220
- bb. NAA 22 Mag; Serial Number-E143714
- cc. S&W 38 SP Hammerless Stainless; Serial Number-CCE8646
- dd. Phoenix 22; Serial Number- 4265202
- ee. Glock 26 (mm); Serial Number-HXC171
- ff. Beretta 9mm; Serial Number-BER059351Z
- gg. Beretta PX4 Storm; Serial Number-PX6955H
- hh. Ruger Mark 2 Target 22 Cal; Serial Number-222-04754
- ii. Glock 33 357; Serial Number-LKS001
- jj. S&W 22 Revolver; Serial Number-CEJ4775
- kk. S&W Mod 19 357 Mag; Serial Number-4K47944
- ll. S&W Mod 29 44 Mag; Serial Number-N772694
- mm. Glock 23 (40 caliber) Unknown Serial Number
- nn. Taurus 1911 (45 caliber) Unknown Serial Number

13. Bowflex Exercise Equipment

- a. Model: Bowflex Fitness (400)
- b. Approximate value: ~\$3,000

14. Household furnishings

15. Personal items

- a. Fishing equipment – various fishing poles and tackle
- b. Hunting equipment – Two deer stands, feeders and trail cameras

16. Shop equipment

- a. Mig Welder
- b. Tug Welder
- c. Miller Diesel Welder (attached to trailer)



- d. Cutting rig (attached to trailer)
- e. Large Tool Box
- f. Portable JOB Box (tool box)
- g. Tools

17. Gun Safe

18. Cash Distributions:

- a. \$914,645.47 in total Cash Distributions from Firstbank/Generations Bank estate account, distributed as follows:
  - i. Date: 12/07/2015
    - 1. Check Amount: \$4,750.00
    - 2. Payable to: "Alex Peterson or Donna Herring"
    - 3. Check #: 2506
  - ii. Date: 08/20/2015
    - 1. Check Amount: \$5,000.00
    - 2. Payable to: "Alex Peterson"
    - 3. Check #: 2488
  - iii. Date: 08/20/2015
    - 1. Check Amount: \$20,000.00
    - 2. Payable to: "Alex Peterson"
    - 3. Check #: 2487
  - iv. Date: 12/17/2015
    - 1. Check Amount: \$884,895.47
    - 2. Payable to: Alex Peterson
    - 3. Check #: Cashier's check – no copy available
- b. These \$914,645.47 in total Cash Distributions from Firstbank/Generations Bank estate account represent the cash residue of the estate after payment of all debts, taxes, estate administration expenses and other distributions. This residue, which was paid to PETERSON pursuant to the family settlement agreement, consisted primarily of two accounts, as follows:
  - i. Berkshire Hathaway guaranteed structured settlement
    - 1. Annuity Contract No. BN-12-03123
    - 2. Value (per probate inventory & bank statement): \$555,028.55
  - ii. Symetra Financial structured settlement annuity
    - 1. Annuity Contract No. AA0788324
    - 2. Case #: CAS-7155391-CV7DWS
    - 3. Value (per probate inventory): \$6,500.00/mo (X 180 mos. = \$1,170,000.00)
    - 4. Lump sum value (per bank statement wire transfer): \$824,884.27
    - 5. Lump sum payee: "The estate of Matthew Jacobs"

6. NOTE: Per the Family Settlement Agreement signed by Tina Nutt (on JACOB's behalf) and PETERSON, JACOB's share of the cash of the estate (\$250,000.00) was payable from this Symetra annuity lump sum payment.

Known Assets Distributed to PETERSON  
(not listed in Family Settlement Agreement)

19. Polaris side by side ATV W/LIGHTBAR

- a. Year: 2012
- b. Model: R12WH7EAH
- c. VIN: 4XAWH7EA6C2250517
- d. Engine Number- 0120439705091
- e. Estimated Value- \$19,191.38
- f. Purchased 5/22/2012

20. Boat (with archery equipment)

- a. Make: Matthews
- b. Model: Compound boat (i.e., hunting boat)

21. Boat

- a. Make: Hoyt
- b. Model: Cross boat